

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**W.E. AUBUCHON CO., INC., AUBUCHON  
DISTRIBUTION, INC., W.E. AUBUCHON  
CO. INC. EMPLOYEE MEDICAL  
BENEFIT PLAN, and AUBUCHON  
DISTRIBUTION, INC. EMPLOYEE  
MEDICAL BENEFIT PLAN**

**Plaintiffs,**

**v.**

**BENEFIRST, LLC,**

**Defendant.**

**CIVIL ACTION No. 05-40159 FDS**

**BENEFIRST'S  
MOTION FOR RECONSIDERATION OF COURT'S DISCOVERY ORDER  
RELATED TO MEDICAL BILLS**

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Defendant BeneFirst, LLC, pursuant to this Court's order of September 7, 2006, hereby requests this Court to reconsider its ruling compelling BeneFirst to produce to the Plaintiffs all claims files, including the actual bills in BeneFirst's possession, custody or control. In support of its motion, BeneFirst hereby incorporates by reference its contemporaneously filed memorandum in support of this motion, certain excerpts of the deposition of Charles T. Dobens, and the affidavit of Charles T. Dobens.

Respectfully submitted,

The Defendant, **BeneFirst, LLC**  
By its attorneys,

**Dated:** September 18, 2006

/s/ Stephen D. Rosenberg

/s/ Eric L. Brodie

Stephen D. Rosenberg [BBO# 558415]

Eric L. Brodie [BBO# 639833]

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## CERTIFICATE OF SERVICE

I hereby certify that today, September 18, 2006, a copy of *BeneFirst's Motion for Reconsideration of Court's Discovery Order Related to Medical Bills* along with the referenced supporting memorandum, deposition excerpts, and affidavit were served via the ECF system upon the following attorneys of record, each of whom has been identified as a registered participant on the Notice of Electronic Filing (NEF):

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*/s/ Eric L. Brodie*

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Eric L. Brodie

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